

PEB/JK: USAO 2021R00772
JTM 01.27.22

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DENNIS JAMES HARRISON,

Defendant.

CRIMINAL NO.

JKB 22 cr 37
(Sexual Exploitation of a Child, 18 U.S.C. § 2251(a); Coercion and Enticement of a Minor, 18 U.S.C. § 2422(b); Possession of Child Pornography, 18 U.S.C. § 2252(a)(4)(B); Commission of a Felony Crime Involving a Minor by a Registered Sex Offender, 18 U.S.C. § 2260A; Forfeiture, 18 U.S.C. §§ 2253 and 2428)

INDICTMENT

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

General Allegations

At all times material to this Superseding Indictment:

1. **DENNIS JAMES HARRISON (“HARRISON”)** was born in 1982, and resided in Rocky Ridge, Maryland.

2. Jane Doe 1 was a 12-year-old female, and a resident of Shippensburg, Pennsylvania.

3. Beginning no later than September 2020 and continuing through at least in or about August 2021, **HARRISON** traveled to Jane Doe 1’s residence in Pennsylvania where he took custody of Jane Doe 1 and drove Jane Doe 1 to various locations in Maryland, including **HARRISON’s** residence, where he engaged in sexual activity with Jane Doe 1.

4. Beginning no later than September 2020 and continuing through at least in or about August 2021, **HARRISON** used the internet and text messaging applications to persuade, induce,

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entice, and coerce Jane Doe 1 to engage in sexually explicit conduct. During these internet-based communications, **HARRISON** caused, and attempted to cause, Jane Doe 1 to produce visual depictions of herself that depicted Jane Doe 1 engaged in sexually explicit conduct.

The Charges

5. On or about June 4, 2020, in the District of Maryland and elsewhere, the defendant

DENNIS JAMES HARRISON,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a series of nine (9) image files, which depict Jane Doe 1, a minor female, nude and partially nude, laying on her back and an adult penis penetrating the mouth of Jane Doe 1, said image files having been produced and stored on an Alcatel Raven phone, model A574BL, S/N: 015295003654430, which was manufactured outside Maryland.

18 U.S.C. § 2251(a) & 2256

COUNT TWO
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 4 of the General Allegations of Count One of this Indictment are specifically referenced and incorporated herein.
2. Beginning in at least in or about September 2020 and continuing through at least in or about August 2021, in the District of Maryland and elsewhere, the defendant,

DENNIS JAMES HARRISON,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a prepubescent minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, four (4) image files that each depict an adult penis penetrating the mouth Jane Doe 1, a minor female, said image files having been stored in the Google account: allseasonhandypros@gmail.com, with servers outside Maryland.

18 U.S.C. § 2251(a) & 2256

COUNT THREE
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 4 of the General Allegations of Count One of this Indictment are specifically referenced and incorporated herein.

2. On or about July 30, 2021, in the District of Maryland and elsewhere, the defendant,

DENNIS JAMES HARRISON,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a prepubescent minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a series of three (3) image files which depict Jane Doe 1, a prepubescent female, nude in the shower from head to belly, with her breasts exposed, said image files having been stored on an Alcatel Raven phone, model A574BL, S/N: 015295003654430, manufactured outside Maryland.

18 U.S.C. § 2251(a) & 2256

COUNT FOUR
(Coercion and Enticement)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 4 of the General Allegations of Count One of this Indictment are specifically referenced and incorporated herein.
2. Beginning in at least in or about September 2020 and continuing through at least in or about August 2021, in the District of Maryland and elsewhere, the defendant,

DENNIS JAMES HARRISON,

using any facility and means of interstate and foreign commerce, knowingly attempted to and did persuade, induce, entice, and coerce Jane Doe 1, who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. §§ 2422(b), 2427

COUNT FIVE THROUGH SEVEN
(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

1. Jane Doe 2 was a 10 and 11-year-old female, and a resident of St. Thomas, Pennsylvania.

2. In or about 2018, in the District of Maryland and elsewhere, the defendant,

DENNIS JAMES HARRISON,

knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, **HARRISON** used a hidden camera and a mobile phone to produce videos and images of Jane Doe 2 in various stages of undress, said files having been made without Jane Doe 2's knowledge, as follows:

Count	Details
5	A series of 38 image files that depict Jane Doe 2 nude and partially nude, in a bedroom in Pennsylvania.
6	A series consisting of one video and 15 image files that depict Jane Doe 2 nude and partially nude, as she enters and exits a shower in a bathroom in Pennsylvania.
7	A series of 3 image files that depict Jane Doe 2 nude and partially nude, in bathroom in Maryland. <i>Per B</i>

said image files having been produced on an Alcatel Raven, Model A574BL, S/N: 015295003654430, manufactured outside Maryland.

18 U.S.C. § 2251(a) & 2256

COUNT EIGHT

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about August 12, 2021, in the District of Maryland, the defendant,

DENNIS JAMES HARRISON,

did knowingly possess and knowingly access with intent to view one or more matters which contained any visual depiction that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, that is, the defendant possessed an Alcatel Raven phone, model A574BL, S/N: 015295003654430, a San Disk Cruzer Glide USB, 16GB, S/N: 9069510C, a SanDisk Cruzer USB, S/N: BM180926786B, S/N: 823ACDB3, a red USB 8GB, S/N: 003C171E, a Kenmore USB 4GB, S/N: 00C9FE8, a SanDisk micro SD card 16GB, S/N: 37376532, a red tablet, model QT-7, and a San Disk Cruzer Glide USB 16GB, S/N: BL1806252, each containing one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252(a)(4)(B), (b)(2) & 2256

18 U.S.C. § 2

COUNT NINE

(Commission of a Felony Crime Involving a Minor by a Registered Sex Offender)

The Grand Jury for the District of Maryland further charges that:

Between in or about 2018 and in or about July 2021, in the District of Maryland, the defendant,

DENNIS JAMES HARRISON,

committed the felony offenses involving a minor charged in Counts One through Seven of this Indictment at times defendant **HARRISON** was required to register as a sex offender under the laws of the State of Maryland.

18 U.S.C. § 2260A

SPECIAL ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Counts One through Three and Five through Eight of this Indictment are incorporated here.
2. As a result of the offenses set forth in Counts One through Three and Five through Eight of the Indictment, prior to 2018, the defendant,

DENNIS JAMES HARRISON,

had a prior conviction under the law of any State relating to aggravated sexual abuse, sexual abuse, and abusive sexual conduct involving a minor or ward, and the production, possession, receipt, mailing, sale, distribution, shipment, and transportation of child pornography, to wit:

- a. On or about August 12, 2009, in the Court of Common Pleas of Adams County, Pennsylvania, in Case No. CP-01-CR-1029-2005, the defendant was convicted of seventy-seven counts of possession of child pornography, in violation of Section 6312(d)(1) of the Pennsylvania Crimes Code.

18 U.S.C. §§ 2252(b)(1), 2252A(b)(2), 2251(e)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 2253 and 2428, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under any of the offenses alleged in Counts One through Eight of this Indictment.

Child Pornography Forfeiture

2. Upon conviction of any of the offenses set forth in Counts One through Three and Five through Eight of this Indictment, the defendant,

DENNIS JAMES HARRISON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received, or possessed in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Coercion and Enticement Forfeiture

3. Upon conviction of any of the offenses set forth in Count Four of this Indictment, the defendant,

DENNIS JAMES HARRISON,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a):

- a. any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
- b. any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

Property Subject to Forfeiture


- 4. The property to be forfeited includes, but is not limited to, the following:
 - a. Alcatel Raven phone, model A574BL S/N: 015295003654430
 - b. SanDisk Cruzer Glide USB, 16GB, S/N: 9069510C
 - c. SanDisk Cruzer USB, S/N: BM180926786B S/N: 823ACDB3
 - d. Red USB 8GB, S/N: 003C171E
 - e. Silver Kenmore USB 4GB, S/N: 00C9FE8
 - f. SanDisk micro SD card 16GB, S/N: 37376532
 - g. Red tablet, model QT-7
 - h. SanDisk Cruzer Glide USB 16GB, S/N: BL1806252

Substitute Assets

- 5. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)


Erik L. Barron
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: February 3, 2022